

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN)
DEONTAE TATE, JEREMY S. MELTON)
ISSACCA POWELL, KEITH BURGESS,)
TRAVIS BOYD, TERRENCE DRAIN)
and KIMBERLY ALLEN on behalf of)
themselves and all similarly situated persons,)

Plaintiffs,)

v.)

Civil Action No. 2:16-cv-02907-SHM-tmp
Jury Demanded

BILL OLDHAM, in his individual capacity)
as former Sheriff of Shelby County,)
Tennessee; FLOYD BONNER, JR., in his)
official capacity as the Sheriff of Shelby)
County, Tennessee; ROBERT MOORE,)
in his individual capacity as former Jail)
Director of Shelby County, Tennessee;)
KIRK FIELDS, in his official capacity as)
the Jail Director of Shelby County,)
Tennessee; CHARLENE MCGHEE, in her)
individual capacity as former Assistant)
Chief of Jail Security of Shelby County,)
Tennessee; REGINALD HUBBARD, in his)
official capacity as Assistant Chief of Jail)
Security of Shelby County, Tennessee;)
DEBRA HAMMONS, in her individual)
capacity as former Assistant Chief of Jail)
Programs; TIFFANY WARD, in her official)
capacity as the Assistant Chief of Jail)
Programs of Shelby County, Tennessee;)
SHELBY COUNTY, TENNESSEE, a)
Tennessee municipality; TYLER)
TECHNOLOGIES, INC., a foreign)
corporation; GLOBAL TEL*LINK)
CORPORATION, a foreign corporation;)
SOFTWARE AG USA, INC., a foreign)
corporation; and SIERRA-CEDAR, INC.,)
a foreign corporation,)

Defendants.)

UNOPPOSED MOTION FOR THE WITHDRAWAL OF AMBER D. FLOYD

Shelby County Defendants¹ hereby move for the withdrawal of Amber D. Floyd as attorney of record in this case in accordance with Local Rule 83.5. Ms. Floyd recently left the law firm Wyatt, Tarrant & Combs to accept a position with the City of Memphis in the City Attorney's Office. Shelby County Defendants will continue to be represented by Robert E. Craddock, Jr., Odell Horton, Jr., Byron N. Brown IV, and Meghan M. Cox of Wyatt, Tarrant & Combs, as well as Assistant County Attorney E. Lee Whitwell. As demonstrated below in the Certificate of Service, there is no opposition to Ms. Floyd's withdrawal, and her withdrawal will not prejudice any party or delay the adjudication of this case.

Respectfully submitted,

/s/ Meghan M. Cox
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Counsel for Shelby County Defendants

¹ "Shelby County Defendants" include Shelby County, Tennessee, and the following individuals named in their individual and/or official capacities: Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, and Tiffany Ward.

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), Meghan M. Cox, counsel for Shelby County Defendants, consulted with counsel for all parties in this action regarding this motion by email dated March 11, 2019. Michael G. McLaren, counsel for Plaintiffs; Bradley E. Trammell, counsel for Tyler Technologies, Inc.; R. Brandon Bundren, counsel for Global TelLink Corporation; Albert G. McLean, counsel for Sierra-Cedar, Inc.; and Douglas F. Halijan, counsel for Software AG USA, Inc. each indicated that they do **not** oppose the relief sought herein.

/s/ Meghan M. Cox

CERTIFICATE OF SERVICE

I certify that the foregoing is being filed via the Court's ECF system this 11th day of March, 2019, for service on all persons registered in connection with this case, including:

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/s/ Meghan M. Cox